

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: Case No. 24-35097  
  
Shaun Parr Chapter 13  
  
Chapter 13 Debtor Hon. Cecelia G. Morris

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**MOTION TO SHORTEN NOTICE PERIOD AND SCHEDULE EXPEDITED HEARING  
FOR MOTION TO EXTEND STAY PURSUANT TO 11 U.S.C 362(C)(3)**

**TO: HONORABLE CECELIA G. MORRIS, UNITED STATES BANKRUPTCY JUDGE**

**SHAUN PARR**, the Debtor in the above-captioned matter, by and through the undersigned counsel, as and for his motion to shorten notice and schedule an expedited hearing on his motion to extend the automatic stay pursuant to 11 U.S.C. 362(c)(3), states as follows:

1. The debtor was the debtor in a case entitled *In re Parr*, 20-35527, which was dismissed on February 6, 2023.
2. The instant case was filed on January 31, 2024.
3. The next hearing date that would allow for the ordinary hearing time is March 19, 2024.
4. A motion under 11 U.S.C. 362(c)(3) must be heard within 30 days of the filing the case, or in this case, March 2, 2024.
5. As such, a motion to shorten time is necessary in order that this matter be heard at a time so that the automatic stay does not expire.

**RELIEF REQUESTED**

6. The Debtor seeks an Order pursuant to Fed. R. Bankr.P. 9006(c) shortening the notice period with respect to the Debtor's motion to extend the automatic stay, and setting the time and date of the hearing to be February 27, 2024 at 9:00 am.

**NOTICE**

7. Debtor's counsel will serve this motion and the motion to extend stay on all creditors and interested parties by regular mail on February 8, 2024, as indicated on the certificate of service annexed hereto.

**BASIS FOR RELIEF REQUESTED**

8. Rule 9006(c) of the Federal Rules of Bankruptcy Procedure provides that "when an act is required or allowed to be done at or within a specified time by these rules or by a notice given thereunder or by order of court, the court for cause shown may in its discretion with or without motion or notice order the period reduced." Federal Rule of Bankruptcy Procedure 9006(c).
9. In the instant case there is good cause to shorten the time to hold a hearing on a Motion to Extend the automatic stay.
10. The Debtor is facing an imminent foreclosure sale that the lender would be able to prosecute were the Automatic Stay to Terminate.
11. The entire purpose of the instant case is to cure the mortgage arrears, thus consummation of the plan necessitates preserving the status quo of the debtor's real property.
12. The Debtor requests that this Court schedule the hearing on the motion to extend stay on February 27, 2024 at 9:00 am.
13. There will be no prejudice to creditors and incalculable benefit to the Debtor by this request as the Plan will pay all creditors in full while preserving the Debtor's overall status quo.

**WHEREFORE**, the Debtor respectfully requests that the Court grant the within motion and enter an Order shortening time pursuant to Fed. R. Bankr. P. 9006(c), setting an expedited hearing to consider the motion to extend the automatic stay.

Dated: Denville, New Jersey  
February 8, 2024

**LAW OFFICES OF  
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